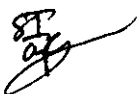


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

MAR 24 2008
BROOKLYN OFFICE



UNITED STATES OF AMERICA

Plaintiff,

v.

STANLEY SOREN, and
RUTH SOREN,

Defendants.

Civil No.

12 1203
FEUERSTEIN, J.
GOLD, M.J.

COMPLAINT

The plaintiff, United States of America, by its attorney, Benton J. Campbell, United States Attorney for the Eastern District of New York, pursuant to the provisions of 26 U.S.C. § 7401, with the authorization of the Secretary of Treasury and at the direction of the Attorney General of the United States, brings this civil action to reduce the unpaid federal income tax and trust fund recovery penalty assessments against defendant, Stanley Soren to judgment; and to reduce the unpaid federal income tax assessments against defendant, Ruth Soren to judgment. The United States complains and alleges as follows:

1. Jurisdiction over this action is conferred upon the district court in 28 U.S.C. §§ 1331, 1340 and 1345 and 26 U.S.C. § 7402(a).
2. Defendant Stanley Soren resides in Staten Island, New York, within the jurisdiction of this Court.
3. Defendant Ruth Soren resides in Staten Island, New York, within the jurisdiction of this Court.

4. On or about the following dates, a delegate of the Secretary of Treasury of the United States made the following assessments against Stanley Soren for unpaid federal income taxes and trust fund recovery penalty assessments, and against Ruth Soren for unpaid federal income taxes, for the following periods in the following amounts (interest and statutory additions continue to accrue on these amounts):

Tax Period Ending December 31,	Date of Assessment	Unpaid Balance of Assessment	Accrued Penalties and Interest to March 3, 2008	Total Assessed Balance as of March 3, 2008
1991	11/27/1995	\$ 1,893.88	\$ 42,900.25	\$ 44,794.13
1992	11/27/1995	\$ 120,782.89	\$ 190,418.58	\$ 311,201.47
1994	11/27/1995	\$ 36,239.94	\$ 44,607.17	\$ 80,847.11
1995	11/25/1996	\$ 97,034.34	\$ 103,940.83	\$ 200,975.17
1996	04/14/1997	\$ 83,480.00	\$ 78,736.18	\$ 162,216.18
1997	11/23/1998	\$ 25,601.18	\$ 27,410.71	\$ 53,011.89
1998	12/06/1999	\$ 13,451.77	\$ 12,434.37	\$ 25,886.14
2005	11/13/2006	\$ 63,662.51	\$ 15,420.00	\$ 79,082.51
2006	11/05/2007	\$ 15,246.75	\$ 653.78	\$ 15,900.53
			TOTAL	\$ 973,915.13
Tax Periods for TFRP Ending (only as to Stanley Soren)	Date of Assessment	Unpaid Balance of Assessment	Accrued Interest to March 3, 2008	Total Assessed Balance as of March 3, 2008
09/30/1998	10/18/1999	\$ 79,862.82	\$ 60,052.64	\$ 139,915.46
03/31/1999	02/21/2000	\$ 18,245.33	\$ 12,849.89	\$ 31,095.22
			TOTAL	\$ 171,010.68

5. On, or about, the date of the assessments described above, a delegate of the Secretary of the Treasury of the United States of America gave notice of the assessment to and made a demand for payment of the assessed liabilities against Stanley Soren and Ruth Soren.

6. Despite such notice and demand, Stanley Soren and Ruth Soren have failed, neglected, or refused to pay the amount of the assessments in full, and, after the application of all abatements, payments and credits, they remain indebted to the United States for unpaid assessed internal revenue taxes and interest in the amount of \$ 973,915.13, as of March 3, 2008, plus such additional amounts that may accrue after that date as provided by law.

7. Additionally, Stanley Soren, despite notice and demand, has failed, neglected, or refused to pay the amount of the trust fund recovery penalty assessments in full, and, after the application of all abatements, payments and credits, he remains further indebted to the United States for unpaid assessed internal revenue taxes and interest in the amount of \$ 171,010.68, as of March 3, 2008, plus such additional amounts that may accrue after that date as provided by law.

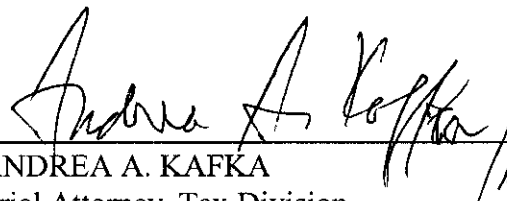
WHEREFORE, the plaintiff, United States of America demands judgment against the defendant-taxpayers, combined in the amount of \$ 973,915.13, and as to Stanley Soren, for an additional amount of \$ 171,010.68; plus such additional amounts that may have accrued from March 3, 2008, or may continue to accrue as provided by law; and prays for the additional following relief:

A. That the Court determine and adjudge that defendants Stanley and Ruth Soren are indebted to the United States for unpaid federal income taxes in the total amount of \$ 973,915.13 as of March 3, 2008, plus fees, interest, and all statutory additions thereafter as provided by law.

B. That the Court determine and adjudge that defendant Stanley Soren is further indebted to the United States for unpaid trust fund recovery penalty assessments for the additional amount of \$ 171,010.68 as of March 3, 2008, plus fees, interest, and all statutory additions thereafter as provided by law.

C. That the United States shall recover its costs in the action, and be awarded such other relief as the court determined is just and proper.

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Dated: March 21, 2008